

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

The Estate of Jon Leon Watson, by and through
by and through its Administrator Ad
Prosequendum Helen Lloyd and Hellen Lloyd,
in her own right

Plaintiff

Case No. 1:16-cv-06578

AFFIDAVIT

v.

Cumberland County Jail, Warden Robert
Balicki in his individual capacity, John Doe
Corrections Officers 1-10 (fictitious
individuals) in their individual capacities, &
CFG Health Systems, LLC

Defendants

I, Conrad J. Benedetto, Esquire being duly sworn depose and say that:

1. I am an attorney at law representing Plaintiffs in the above-entitled matter.
2. Pursuant to the Court's Order, I make this Affidavit.
3. The damages pursuant to the settlement in the matter of the *Estate of Jon Leon Watson, by and through its Administrator Ad Prosequendum Helen Lloyd v. Cumberland County, et al.*, Case No.: 1:16-cv-04216 were allocated as Wrongful Death Damages.
4. The distribution of the settlement proceeds was reviewed with and explained to the client; said distribution thereafter being acknowledged and accepted by the client. A copy of the Distribution Schedule is attached hereto as ***Exhibit "A."***
5. The Distribution Schedule sets forth the gross amount of settlement proceeds, the expenses and attorney's fees.
6. The Distribution Schedule in this matter also sets forth the balance due for satisfaction of the Cumberland County CWA lien. In addition, attached is a copy of the Warrant to Satisfy Judgment #J028716-2006 of Helen Lloyd, filed February 24, 2022. See Correspondence from Cumberland County Social Services dated February 16, 2022 and Warrant to Satisfy of Helen Lloyd collectively as ***Exhibit "B."***

7. The Distribution Schedule also sets forth the net proceeds to be distributed to the children of the Decedent.
8. The Distribution Schedule states disclaimers which were acknowledged and accepted by the client.
9. The only liens that exist to my knowledge, were the amounts due for the aforesaid Cumberland County CWA lien and Judgment of Helen Lloyd. Attached is a copy of the Charles Jones lien search, attached hereto as *Exhibit "C."*
10. The costs and expenses to be reimbursed included costs and expenses for investigation, medical records, filing fees, fees for service of process, deposition costs, expert witness and report fees, filing fees for the District Court, Third Circuit Court of Appeals, NJ Superior Court and Estate Administration fees and costs.
11. Copies of the following documents are attached, collectively as *Exhibit "D"*:
 - a. Letter dated April 8, 2022 of Douglas Rinear, Surrogate Cumberland County;
 - b. Receipt # 1714359;
 - c. Administration Short Certificate;
 - d. Letters of Administration;
 - e. Application Administration;
 - f. Affidavit of Helen Lloyd;
 - g. Qualification Administration;
 - h. Affidavit in Lieu of Administration Bond; and
 - i. Judgment Granting Administration;

LAW OFFICES OF CONRAD J. BENEDETTO

CONRAD J. BENEDETTO, ESQUIRE
Attorney at Law of the State of New Jersey

Dated: 4/13/2022

SWORN AND SUBSCRIBED
TO BEFORE ME THIS 13th
DAY OF APRIL, 2022

Brunilda Echevarria
Notary Public of the
State of Pennsylvania

